

1 Q. What was the interaction?

2 A. I don't remember the specific interaction. You are  
3 talking about what time specifically?

4 Q. 2017.

5 A. I don't remember the specific interaction but I  
6 know at some point, like, I have spoken with him during that  
7 time.

8 Q. Did Mr. Halderman -- did you view Mr. Halderman as  
9 your supervisor?

10 A. Yes.

11 Q. And did he act like a supervisor, that is, give you  
12 instructions on what to do next?

13 A. Yes, but it really would all depend on, like, when,  
14 as well.

15 Q. Okay. What about Richard Seddon, if I am  
16 pronouncing his name correctly? S E D D O N.

17 A. Yes.

18 Q. Was he your supervisor?

19 A. Yes.

20 Q. And did he act like a supervisor, that is, give you  
21 instructions?

22 A. Yes.

23 Q. What about Gaz, G A Z, Thomas?

24 A. Yes.

25 Q. Was he your supervisor?

1 Q. That would have included other employees of Project  
2 Veritas?

3           A.    Yes.

4 Q. And who led the training, that is, who was in  
5 charge of it?

6           A.     Richard Seddon.

7 0 Any other leaders besides Mr. Cadden?

[illegible]

1 state?

2 A. Yes.

3 Q. No one associated with AFT Michigan told you that  
4 your identity had been discovered?

5 A. No.

6 Q. Let's look at Exhibit 35. Exhibit 35 is an e-mail  
7 from Mr. Seddon referring to you and it makes reference to  
8 the possibility of parlaying this information into an  
9 internship at AFT in D.C.

10 Were you informed that Project Veritas was  
11 interested in you attempting to secure an internship at AFT  
12 National?

13 A. Yes.

14 Q. When were you told that?

15 A. I -- I don't remember specifically.

16 Q. Do you remember by whom?

17 A. Richard Seddon.

18 Q. Mr. Seddon?

19 A. Uh-huh, yes.

20 Q. And what were you going to do at AFT -- at AFT  
21 National?

22 A. Get information.

23 Q. Same kind of thing that you had done at AFT  
24 Michigan?

25 A. Yes.